

**U.S. DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

<b>SWEIGERT</b>	<b>CIVIL CASE #:</b>
<b>V.</b>	<b>1:18-CV-08653-VEC</b>
<b>GOODMAN</b>	<b>JUDGE VALERIE E. CAPRONI</b>

**PLAINTIFF'S NOTICE OF MOTION (WITH MEMORANDUM OF LAW IN SUPPORT  
OF MOTION) FOR JUDICIAL NOTICE OF DOCUMENTS AND FACTS IN SUPPORT  
OF DISCOVERY AND PRELIMINARY INJUNCTIVE RELIEF**

Pursuant to Federal Rule of Evidence 201, and in connection with Plaintiffs' Motion for Preliminary Injunctive Relief and discovery, Plaintiff respectfully requests that the Court take judicial notice of the following federal lawsuits that involve the Defendant as a party:

- Civil Action No. 1:20-cv-07269 (VEC), U.S.D.C. for S.D.N.Y., THE NATIONAL ACADEMY OF TELEVISION ARTS AND SCIENCES, INC. and ACADEMY OF TELEVISION ARTS & SCIENCES, vs. MULTIMEDIA SYSTEM DESIGN, INC. d/b/a "CROWDSOURCE THE TRUTH"
- Civil Action No. 1:20-cv-1140, U.S.D.C. for E.D.Va., ROBERT DAVID STEELE & EARTH INTELLIGENCE NETWORK vs. JASON GOODMAN
- Civil Action No. 3:17-cv-00601, U.S.D.C. for E.D.Va., ROBERT DAVID STEELE & EARTH INTELLIGENCE NETWORK vs. JASON GOODMAN

A Certificate of Service appears on the LAST page of this pleading.

Signed this thirteenth day of March 2021.

Respectfully,



D. Geo. Sweigert

**D. GEORGE SWEIGERT**  
**GENERAL DELIVERY**  
**NEVADA CITY, CA 95959-9998**  
**SPOILIATION-NOTICE@MAILBOX.ORG**

## **MEMORANDUM OF LAW**

### **I. THE COURT MAY TAKE JUDICIAL NOTICE OF FACTS THAT ARE NOT SUBJECT TO REASONABLE DISPUTE WHERE THEIR ACCURACY CAN BE DETERMINED BY RELIABLE SOURCES**

Pursuant to Rule 201(b)(2) of the Federal Rules of Evidence, courts may take judicial notice of facts that are not subject to reasonable dispute and are capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned. Where a Court is supplied with the necessary information, taking judicial notice is mandatory. See Fed. R. Evid. 201(d).

### **II. COURT RECORDS ARE SUBJECT TO JUDICIAL NOTICE**

Pleadings and court filings are just the kind of documents that are not subject to reasonable dispute and are capable of accurate and ready determination under Rule 201(b)(2) of the Federal Rules of Evidence. Accordingly, it is proper for courts to take judicial notice of the existence of such documents. See *Roe v. Johnson*, 334 F. Supp. 2d 415, 419-20 (S.D.N.Y. 2004) (recognizing that a court, pursuant to Rule 201(b), may take notice of the public record, including complaints and court opinions); see also *A.I. Trade Finance, Inc. v. Centro Internationale Handelsbank AG*, 926 F. Supp. 378, 387 (S.D.N.Y. 1996) (in taking judicial notice of a judgment in Vienna, Austria, the court pointed out that “[t]he Second Circuit has noted that Rule 201 permits a court to take judicial notice of a foreign judgment”).

### **III. CONCLUSION**

For the reasons set forth above, the Plaintiff respectfully requests that the Court grant, in its entirety, the Plaintiff’s Motion for Judicial Notice of Documents and Facts.

A Certificate of Service appears on the LAST page of this pleading.

Signed this thirteenth day of March 2021.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Geo. Sweigert".

D. Geo. Sweigert

***D. GEORGE SWEIGERT***  
***GENERAL DELIVERY***  
***NEVADA CITY, CA 95959-9998***  
***SPOILIATION-NOTICE@MAILBOX.ORG***

**CERTIFICATE OF SERVICE**

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the twelfth of March, two thousand and twenty-one (2021).

<b>Clerk of the Court, Room 200 U.S. District Court 500 Pearl Street New York, New York 10007-1312 EMAIL: temporary_pro_se_filing@nysd.uscourts.gov</b>	<b>Jason Goodman, CEO Multimedia System Design, Inc. 252 7<sup>th</sup> Avenue, Apart. #6S New York, NY 10001 truth@crowdsourcethetruth.org</b>
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***D. GEORGE SWEIGERT  
Pro Se Non-Attorney  
GENERAL DELIVERY  
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